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706 Sansome Street  
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*Lead Counsel for Direct Purchaser Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

*ALL DIRECT PURCHASER ACTIONS*

**DECLARATION OF DAVID Y. HWU IN  
SUPPORT OF DIRECT PURCHASER  
PLAINTIFFS' OPPOSITION TO THE IRICO  
DEFENDANTS' AMENDED MOTIONS TO  
DISMISS CLAIMS OF DIRECT  
PURCHASER PLAINTIFFS FOR LACK OF  
SUBJECT MATTER JURISDICTION (FED.  
R. CIV. P. 12(b)(1)) (ECF Nos. 5410, 5412)**

Date: May 30, 2019  
Time: 2:00 p.m.  
Judge: Honorable Jon S. Tigar  
Courtroom: 9

**REDACTED VERSION OF DOCUMENT**  
**SOUGHT TO BE SEALED**

1 I, David Y. Hwu, declare:

2 1. I am an attorney at Saveri & Saveri, Inc., Lead Counsel for Direct Purchaser  
3 Plaintiffs (“DPPs”) in this action. I am a member of the Bar of the State of California and admitted  
4 to practice in the Northern District of California. I have been involved in many aspects of this case  
5 since 2011. I make this Declaration in Support of DPPs’ Opposition to the Irico Defendants’  
6 Amended Motions to Dismiss Claims of Direct Purchaser Plaintiffs for Lack of Subject Matter  
7 Jurisdiction (Fed. R. Civ. P. 12(b)(1)) (ECF Nos. 5410, 5412). Except as otherwise stated, I have  
8 personal knowledge of the facts stated below.

9 2. On July 5, 2018, DPPs submitted a letter brief to Judge Vaughn R. Walker (Ret.),  
10 the special master for discovery disputes in this matter, seeking an order to compel supplemental  
11 discovery from the Irico Defendants, including related to sales by China National Electronics  
12 Import & Export Caihong Co. (“Import-Export”; referred to as “Caihong Co.” in briefing before  
13 Judge Walker). After briefing, Judge Walker ordered the Irico Defendants to:

14 search for and produce all documents relating to any and all sales of Irico CRT  
15 Products into the United States during the class period by any party whether  
16 related or not, including Irico Electronics, Xian Irico Display Technology Co, Ltd  
17 and [China National Electronics Import & Export] Caihong Co, and any other  
entity that exported Irico’s CRT products into the United States . . . .

18 ECF No. 5324 at 4–5.

19 3. In connection with further discovery responses and meet and confer, Irico did not  
20 produce any further documents relating to U.S. sales, as required by Judge Walker’s order. On  
21 September 11, 2018, DPPs filed a second motion to compel, to compel compliance with Judge  
22 Walker’s order. After briefing, Judge Walker ordered that “the Irico defendants must search all  
23 Caihong files, and any other files to which they have access, for responsive documents and produce  
24 them to the DPPs in electronic form no later than October 5, 2018.” ECF No. 5352 at 6.

25 4. In response to Judge Walker’s order, on January 16, 2019, the Irico Defendants  
26 electronically produced documents Bates labeled IRI-CRT-00003544 through IRI-CRT-00003645  
27 comprising the production labeled IRI-CRT010. Attached hereto as Exhibit 1 is a true and correct  
28 copy of a letter from Stuart C. Plunkett of Baker Botts L.L.P., counsel for the Irico Defendants, to

1 counsel for DPPs and Indirect Purchaser Plaintiffs (“IPPs”) regarding the transmission of  
 2 production IRI-CRT010, dated January 16, 2019. Mr. Plunkett’s letter states that the “production  
 3 contains documents collected from China National Electronics Import & Export Caihong Co.  
 4 (‘CNEIECC’), including documents from the CNEIECC archives.”

5 5. Attached hereto as Exhibit 2 is a true and correct copy of an email chain I received  
 6 on January 23, 2019, including an email from Tom Carter of Baker Botts L.L.P. to Qianwei Fu of  
 7 Zelle LLP, counsel for IPPs. According to Mr. Carter’s email, the files for IRI-CRT-00003544,  
 8 IRI-CRT-00003546, and IRI-CRT-00003643 are “.DBF” database files that require a DBF viewer  
 9 application in order to view the Chinese characters. Using the DBF viewer application  
 10 recommended by Mr. Carter, I saw that IRI-CRT-00003544 native file contained 8,966 rows of  
 11 entries, IRI-CRT-00003546 contained 1,071 rows, and IRI-CRT-00003643 3,115 rows. I  
 12 determined that translating and printing these databases in their entirety for the purposes of  
 13 examining a deposition witness would be impractical. In accordance with section XVI.C. of the  
 14 Court’s Order re Discovery and Case Management Protocol, ECF No. 1128 (Apr. 3, 2012) (“(iii)  
 15 “Calendars, notebooks, annual reports, financial statements and regulatory filings need not be  
 16 translated in their entirety”), I copied and pasted excerpts from the files into Microsoft Excel  
 17 spreadsheets which I subsequently had certified translated by one of DPPs’ translation vendors.  
 18 Because it was not possible to print the database files with row numbers using the DBF viewer  
 19 application, after excerpting entire rows into Excel, I added reference numbers to each row to  
 20 indicate the source row from the database so that each entry could be located in the original native  
 21 file.

22 6. IRI-CRT-00003546E (Selected Records) was marked as Deposition Exhibit No.  
 23 8413 and is Exhibit 15 to the Saveri Declaration, filed herewith.

24 7. Based on the data contained in IRI-CRT-00003546, it appears that from [REDACTED]  
 25 [REDACTED] sold CRTs and CRT products to companies located in the U.S., including,  
 26 among others, [REDACTED]  
 27 [REDACTED]. According to internet research I conducted, [REDACTED] is a company based in  
 28

1 [REDACTED]. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the  
2 [REDACTED] website I downloaded on February 26, 2019 from [REDACTED].

3 I declare under the penalty of perjury under the laws of the United States of America that  
4 the foregoing is true and correct.

5 Executed this 1st day of April, 2019 in San Francisco, California.

6  
7 /s/ David Y. Hwu  
David Y. Hwu

# **EXHIBIT 1**

# BAKER BOTTS LLP

101 CALIFORNIA ST.  
SUITE 3600  
SAN FRANCISCO, CALIFORNIA  
94111

TEL +1.415.291.6200  
FAX +1.415.291.6300  
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AUSTIN  
BEIJING  
BRUSSELS  
DALLAS  
DUBAI

HONG KONG  
HOUSTON

LONDON  
MOSCOW  
NEW YORK  
PALO ALTO  
RIYADH

**SAN FRANCISCO**  
WASHINGTON

January 16, 2019

*VIA E-MAIL*

R. Alexander Saveri (E-mail: [rick@saveri.com](mailto:rick@saveri.com))  
Geoffrey C. Rushing (E-mail: [grushing@saveri.com](mailto:grushing@saveri.com))  
Cadio Zirpoli (E-mail: [cadio@saveri.com](mailto:cadio@saveri.com))  
Matthew D. Heaphy (E-mail: [mheaphy@saveri.com](mailto:mheaphy@saveri.com))  
SAVERI & SAVERI, INC.  
706 Sansome St # 200  
San Francisco, CA 94111

Mario N. Alioto ([malioto@tatp.com](mailto:malioto@tatp.com))  
Lauren C. Capurro ([lauren russell@tatp.com](mailto:lauren russell@tatp.com))  
Joseph M. Patane ([jpatane@tatp.com](mailto:jpatane@tatp.com))  
Trump, Alioto, Trump & Prescott, LLP  
2280 Union Street  
San Francisco, CA 94123

Christopher Micheletti ([cmicheletti@zelle.com](mailto:cmicheletti@zelle.com))  
44 Montgomery Street  
Suite 3400  
San Francisco CA 94104

Re: In re: Cathode Ray Tube (CRT) Antitrust Litigation -  
Master File No. 3:07-cv-05944-SC; MDL No. 1917

Counsel:

Irico Defendants are electronically producing documents Bates labeled IRI-CRT-00003544 through -3645, which can be downloaded at in the link included in the cover email. Passwords to access the download link and extract the files will be sent under separate cover. Irico Defendants designate this submission as "Confidential" pursuant to the Stipulated Protective Order.

This production contains documents collected from China National Electronics Import & Export Caihong Co. ("CNEIECC"), including documents from the CNEIECC archives.

Stuart C. Plunkett  
TEL: 415.291.6203  
FAX: 415.291.6303  
[stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)

If you have any questions or have difficulty accessing these documents, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stuart C. Plunkett', with a long horizontal flourish extending to the right.

Stuart C. Plunkett

## **EXHIBIT 2**



## Matthew Heaphy

---

**From:** Tom.Carter@BakerBotts.com  
**Sent:** Wednesday, January 23, 2019 2:12 PM  
**To:** QFu@zelle.com; stuart.plunkett@bakerbotts.com  
**Cc:** john.taladay@bakerbotts.com; erik.koons@bakerbotts.com; Matthew Heaphy; Geoff Rushing; Rick Saveri; CMicheletti@zelle.com; malioto@tatp.com; lauren russell@tatp.com; kaylee.yang@bakerbotts.com; reilly.stoler@bakerbotts.com; yan.zhang@bakerbotts.com; David Hwu  
**Subject:** RE: Irico 12/7/18 and 1/16/19 Production Issues  
**Attachments:** IRI-CRT009 File Listing.xlsx

Hi Qianwei,

As discussed on our meet and confer call this afternoon, here is information on how to access the Chinese characters in the files you described below.

1. Production IRI-CRT009: as discussed, the Excel files exported from Irico's Newgrand database do not have viewable Chinese characters due to corruption in the source data. However, the Chinese characters are preserved in .csv files exported from the same source data. Please see the extracted text files for the .csv files identified in the attached table. Each .xls file has a corresponding .csv file exported from the same source data, identified by the "Group No" and "File Path" fields on the attached table.
2. Production IRI-CRT010: the three files you identified are .DBF database files. The Chinese characters can be viewed in the native files by taking the following steps:
  - Download and install a DBF viewer application (a number are publicly available for free; <http://dbfviewer.com/> is one option)
  - If the DBF viewer application does not properly display the Chinese characters after opening the native file, change the following setting on your PC: Control Panel -> Region -> Administrative -> Current language for non-Unicode programs -> change to "Chinese (Simplified, China)".
  - After restarting your PC, the DBF viewer should display the Chinese characters correctly.

Please let us know if you continue to have trouble accessing the files after trying the steps above.

Best,  
Tom Carter

---

**From:** Qianwei Fu <QFu@zelle.com>  
**Sent:** Friday, January 18, 2019 5:39 PM  
**To:** Plunkett, Stuart <stuart.plunkett@bakerbotts.com>  
**Cc:** Taladay, John <john.taladay@bakerbotts.com>; Koons, Erik <erik.koons@bakerbotts.com>; mheaphy@saveri.com; Geoff@saveri.com; Rick@saveri.com; Christopher T. Micheletti <CMicheletti@zelle.com>; malioto@tatp.com; Carter, Tom <Tom.Carter@BakerBotts.com>; lauren russell@tatp.com; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Stoler, Reilly <reilly.stoler@bakerbotts.com>; Zhang, Yan <yan.zhang@bakerbotts.com>; David Hwu <dhwu@saveri.com>  
**Subject:** Irico 12/7/18 and 1/16/19 Production Issues

Stuart –

Some documents in Irico's 12/7/18 and 1/16/19 productions cannot be accessed properly.

(1) Production #9: your 12/7/18 Letter explains that while the Chinese characters do not display properly in Excel, the original source data can be found in the associated text file. However, about half of the text files don't contain any Chinese characters at all (e.g., IRI-CRT-00003526, 3529, 3530, 3532, 3534, 3536, 3538, 3539, 3542).

(2) Production #10: the Chinese characters in IRI-CRT-00003544, 46, and 643 do not display properly and the associated text files do not contain those characters either.

Can you please check with Irico to fix these production issues?

Thanks,  
Qianwei

**Qianwei Fu**  
Attorney at Law  
[qfu@zelle.com](mailto:qfu@zelle.com)

## **ZELLE** LLP

44 Montgomery Street, Suite 3400  
San Francisco, CA 94104  
D (415) 633-1906  
F (415) 693-0770  
[vCard](#) | [Bio](#) | [Website](#)

Boston | Dallas | London | Miami | Minneapolis  
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---

**From:** [stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com) <[stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)>  
**Sent:** Thursday, January 17, 2019 8:52 PM  
**To:** [lauren russell@tntp.com](mailto:lauren russell@tntp.com)  
**Cc:** Qianwei Fu <[qfu@zelle.com](mailto:qfu@zelle.com)>; [john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com); [erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com); [mheaphy@saveri.com](mailto:mheaphy@saveri.com); [Geoff@saveri.com](mailto:Geoff@saveri.com); [Rick@saveri.com](mailto:Rick@saveri.com); Christopher T. Micheletti <[cmicheletti@zelle.com](mailto:cmicheletti@zelle.com)>; [malioto@tntp.com](mailto:malioto@tntp.com); [Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com); [kaylee.yang@bakerbotts.com](mailto:kaylee.yang@bakerbotts.com); [reilly.stoler@bakerbotts.com](mailto:reilly.stoler@bakerbotts.com); [yan.zhang@bakerbotts.com](mailto:yan.zhang@bakerbotts.com)  
**Subject:** Re: Irico: 1/16/19 Letter from Capurro to Plunkett

**--EXTERNAL EMAIL--**

Geoff and Matt, would 1:00 Wednesday work for you?

On Jan 17, 2019, at 5:53 PM, Lauren C. Capurro <[lauren russell@tntp.com](mailto:lauren russell@tntp.com)> wrote:

We are available next Wednesday afternoon.

On Thu, 17 Jan 2019 18:36:08 +0000  
<[stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)> wrote:  
> Are plaintiffs available for a meet and confer call on  
> Wednesday, anytime after 12:30 PT?  
>

> Stuart C. Plunkett  
> Partner, San Francisco Office  
> [stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)<<mailto:stuart.plunkett@bakerbotts.com>>  
> T +1.415.291.6203  
> C +1.415.608.8165  
>  
>From: Qianwei Fu <[QFu@zelle.com](mailto:QFu@zelle.com)>  
> Sent: Wednesday, January 16, 2019 9:39 AM  
> To: Plunkett, Stuart <[stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)>  
> Cc: Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Koons,  
> Erik <[erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com)>; [LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com);  
> [mheaphy@saveri.com](mailto:mheaphy@saveri.com); [Geoff@saveri.com](mailto:Geoff@saveri.com); [Rick@saveri.com](mailto:Rick@saveri.com);  
> Christopher T. Micheletti <[CMicheletti@zelle.com](mailto:CMicheletti@zelle.com)>;  
> [malioto@tstp.com](mailto:malioto@tstp.com); Carter, Tom  
> <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>; Yang, Kaylee  
> <[kaylee.yang@bakerbotts.com](mailto:kaylee.yang@bakerbotts.com)>; Stoler, Reilly  
> <[reilly.stoler@bakerbotts.com](mailto:reilly.stoler@bakerbotts.com)>  
> Subject: Irico: 1/16/19 Letter from Capurro to Plunkett  
>  
> Stuart –  
>  
> Please see attached.  
>  
> Thanks,  
> Qianwei  
>  
>  
> Qianwei Fu  
> Attorney at Law  
> [qfu@zelle.com](mailto:qfu@zelle.com)<<mailto:qfu@zelle.com>>  
>  
> ZELLE LLP  
> 44 Montgomery Street, Suite 3400  
> San Francisco, CA 94104  
> D (415) 633-1906  
> F (415) 693-0770  
> vCard<<http://www.zelle.com/vcard-32.vcf>> |  
> Bio<<http://www.zelle.com/attorneys-32.html>> |  
> Website<<http://www.zelle.com/>>  
>  
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> [stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)<<mailto:stuart.plunkett@bakerbotts.com>>  
> <[stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)<<mailto:stuart.plunkett@bakerbotts.com>>>  
> Sent: Tuesday, January 15, 2019 12:37 PM  
> To:  
> [LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)<<mailto:LaurenRussell@TATP.com>>;  
> [Geoff@saveri.com](mailto:Geoff@saveri.com)<<mailto:Geoff@saveri.com>>  
> Cc:  
> [john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)<<mailto:john.taladay@bakerbotts.com>>;  
> [erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com)<<mailto:erik.koons@bakerbotts.com>>;

>mheaphy@saveri.com<mailto:mheaphy@saveri.com>;  
>Rick@saveri.com<mailto:Rick@saveri.com>; Christopher T.  
>Micheletti  
><cmicheletti@zelle.com<mailto:cmicheletti@zelle.com>>;  
>Qianwei Fu <qfu@zelle.com<mailto:qfu@zelle.com>>;  
>malioto@tatp.com<mailto:malioto@tatp.com>  
> Subject: RE: CRT discovery and briefing schedule  
>  
> --EXTERNAL EMAIL--  
>  
> All: we will be providing an update on outstanding  
>discovery items, and responding to your proposed  
>schedule. Stuart  
>  
> Stuart C. Plunkett  
> Partner, San Francisco Office  
> [stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)<mailto:stuart.plunkett@bakerbotts.com>  
> T +1.415.291.6203  
> C +1.415.608.8165  
>  
>From: Lauren Capurro (Russell)  
><[LaurenRussell@TATP.com](mailto:LaurenRussell@TATP.com)<mailto:LaurenRussell@TATP.com>>  
> Sent: Tuesday, January 15, 2019 12:28 PM  
> To: 'Geoff Rushing'  
><[Geoff@saveri.com](mailto:Geoff@saveri.com)<mailto:Geoff@saveri.com>>; Plunkett,  
>Stuart  
><[stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)<mailto:stuart.plunkett@bakerbotts.com>>  
> Cc: Taladay, John  
><[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)<mailto:john.taladay@bakerbotts.com>>;  
>Koons, Erik  
><[erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com)<mailto:erik.koons@bakerbotts.com>>;  
>'Matthew Heaphy'  
><[mheaphy@saveri.com](mailto:mheaphy@saveri.com)<mailto:mheaphy@saveri.com>>; 'Rick  
>Saveri' <[Rick@saveri.com](mailto:Rick@saveri.com)<mailto:Rick@saveri.com>>;  
>[CMicheletti@zelle.com](mailto:CMicheletti@zelle.com)<mailto:CMicheletti@zelle.com>;  
>[QFu@zelle.com](mailto:QFu@zelle.com)<mailto:QFu@zelle.com>;  
>[malioto@tatp.com](mailto:malioto@tatp.com)<mailto:malioto@tatp.com>  
> Subject: RE: CRT discovery and briefing schedule  
>  
> Stuart:  
>  
> IPPs second the DPP request for an update regarding  
>Irico's production of documents, which you previously  
>said would be completed by "early January." See Dec. 3,  
>2018 letter (attached). IPPs are also anxious to receive  
>the CRT models nos. and the list of TV brands that  
>sourced CRTs from Irico, which you promised to provide  
>"fairly soon" on our November 28, 2018 call. See id.  
>Please let us know when we can expect to receive this  
>information.  
>  
> We will shortly be sending a list of other outstanding  
>items, all of which were also detailed in our Dec. 3,  
>2018 letter.  
>  
> Thank you for your attention to these matters.  
>  
> Best,  
>  
> Lauren  
>

> Lauren C. Capurro (Russell)  
> Attorney at Law  
> Trump, Alioto, Trump & Prescott, LLP  
> 2280 Union Street  
> San Francisco, CA 94123  
> Tel: (415) 563-7200  
> Direct line: (415) 447-1496  
> Cell: (415) 860-5051  
> Fax: (415) 346-0679  
> E-mail:  
> [lauren russell@tntp.com](mailto:lauren russell@tntp.com)<<mailto:lauren russell@tntp.com>>

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>  
> From: Geoff Rushing [<mailto:Geoff@saveri.com>]  
> Sent: Friday, January 11, 2019 4:16 PM  
> To:  
> [stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)<<mailto:stuart.plunkett@bakerbotts.com>>  
> Cc:  
> [john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)<<mailto:john.taladay@bakerbotts.com>>;  
> [erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com)<<mailto:erik.koons@bakerbotts.com>>;  
> Lauren Capurro (Russell); Matthew Heaphy; Rick Saveri;  
> [CMicheletti@zelle.com](mailto:CMicheletti@zelle.com)<<mailto:CMicheletti@zelle.com>>;  
> [QFu@zelle.com](mailto:QFu@zelle.com)<<mailto:QFu@zelle.com>>  
> Subject: CRT discovery and briefing schedule

>  
> Stuart:  
>  
> Here is a stipulation for discovery and briefing based  
> on depositions going forward the week of March 4, as we  
> have agreed. Please forward proposed revisions,  
> comments, etc. at your earliest convenience.

>  
> Can you please also provide an update on your clients'  
> plans to produce additional documents?

>  
> Happy new year and have a nice weekend.

>  
> Geoff

>  
>  
> Confidentiality Notice:

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Group No	Filename	Prod Begin Bates	File Path
1	01 彩虹集团公司 1999 商品销售收入.csv	IRI-CRT-00003527	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 1999 商品销售收入.csv
1	01 彩虹集团公司 1999 商品销售收入.xls	IRI-CRT-00003526	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 1999 商品销售收入.xls
2	01 彩虹集团公司 2000 商品销售收入.csv	IRI-CRT-00003528	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 2000 商品销售收入.csv
2	01 彩虹集团公司 2000 商品销售收入.xls	IRI-CRT-00003529	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 2000 商品销售收入.xls
3	01 彩虹集团公司 2001 商品销售收入.csv	IRI-CRT-00003531	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 2001 商品销售收入.csv
3	01 彩虹集团公司 2001 商品销售收入.xls	IRI-CRT-00003530	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 2001 商品销售收入.xls
4	01 彩虹集团公司 2002 商品销售收入.csv	IRI-CRT-00003533	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 2002 商品销售收入.csv
4	01 彩虹集团公司 2002 商品销售收入.xls	IRI-CRT-00003532	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 2002 商品销售收入.xls
5	01 彩虹集团公司 2003 商品销售收入.csv	IRI-CRT-00003535	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 2003 商品销售收入.csv
5	01 彩虹集团公司 2003 商品销售收入.xls	IRI-CRT-00003534	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 2003 商品销售收入.xls
6	01 彩虹集团公司 2005 商品销售收入.csv	IRI-CRT-00003537	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 2005 商品销售收入.csv
6	01 彩虹集团公司 2005 商品销售收入.xls	IRI-CRT-00003536	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\01 彩虹集团公司\01 彩虹集团公司 2005 商品销售收入.xls
7	04 彩虹集团公司 2005 主营业务收入.csv	IRI-CRT-00003541	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\04 彩虹集团公司\04 彩虹集团公司 2005 主营业务收入.csv
7	04 彩虹集团公司 2005 主营业务收入.xls	IRI-CRT-00003538	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\04 彩虹集团公司\04 彩虹集团公司 2005 主营业务收入.xls
8	04 彩虹集团公司 2006 主营业务收入.csv	IRI-CRT-00003540	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\04 彩虹集团公司\04 彩虹集团公司 2006 主营业务收入.csv
8	04 彩虹集团公司 2006 主营业务收入.xls	IRI-CRT-00003539	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\04 彩虹集团公司\04 彩虹集团公司 2006 主营业务收入.xls
9	04 彩虹集团公司 2007 主营业务收入.csv	IRI-CRT-00003543	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\04 彩虹集团公司\04 彩虹集团公司 2007 主营业务收入.csv
9	04 彩虹集团公司 2007 主营业务收入.xls	IRI-CRT-00003542	\0002HD002\0002HD002\Project KONA (H36846) - 005.ad1\04 彩虹集团公司\04 彩虹集团公司 2007 主营业务收入.xls

# **EXHIBIT 3**

**[Document Submitted Under Seal]**